

FCC (Federal Communications Commission)
445 12th St., SW, Room TW-A325
Washington, DC 20554

May 18th, 2010

To whom it may concern,

My name is Chris Milka and I am a Special Education Administrator with Kendall County Special Education Cooperative located in Illinois. I am writing in response to the Public Notice (CG Docket No. 03-123) in relation to the proposed National Exchange Carrier Association on the payment formula for telecommunications relay services. With the position that I am in, it has been critical for me to communicate with various students and families who are deaf or hard of hearing and have utilized video relay services as a real-time format to communicate; as well as being able to communicate the critical non-verbal communication (intonation, voice tone, body posture, gesturing, eye contact, facial emotional expression) with the message I am portraying. Through my various usages as the person initiating the conversation and being the recipient of the services, I have used several of the telecommunication agencies, with some of my experiences being positive, as well as negative. One company in particular, Sorenson Video Relay System, has continuously provided exemplary services with each of the interpreters communicating effectively; expressing the intensity and the actual meaning of the message through the speed at which sign language is utilized, the power and force of different sign language, as well the basic human nature of emotional recognition through the use of facial expression, while maintaining a high level of integrity and confidentiality.

After reviewing the proposed formulas based upon a monthly minute tier system, I am fearful that with the size of Sorenson VRS the quality and quickness will be impacted, as well as minimal other agencies. Sorenson VRS is one of the leading providers of the video relay services with strong advocacy for professional development, outreach programs for Deaf individuals, and a high response rate. With the proposed changes, Sorenson VRS will not be able to provide the high level of service that the deaf community needs and is entitled to. With the detrimental impact on video communication, the only other means of communication will be through the use of text messaging and email systems. Within text message or email communications; the intimacy of the relationship is removed, the immediacy of responses is interrupted, and the fidelity of the conversation is lost.

Specifically, during crisis situations in working with students who are deaf and have emotional disturbances; attempting to get in touch with deaf parents to communicate the urgency of a situation, without VRS, is cancelled. The school system is responsible to act en loco parentis; meaning to act as the parent while that child is at school; not being able to have the ability to utilize a video relay service, such as the reliable Sorenson VRS; takes a crisis situation to a whole new level. With a hearing student, the ability to pick up a phone and immediately communicate the situation to the parent is there, providing the best support for the student and creating a collaborative relationship

with the family and the school. For a deaf family, not having the ability to communicate through a relay service and waiting for text messaging or a simple email, which can be interpreted incorrectly; not only delays the situation, but intensifies the situation because critical time is lost; putting not only the child in danger, then the family and the school; destroying the necessary relationship between the two entities.

I would like to finish with, communication is a God given right that all individuals should have equal access to. By taking away the services of Sorenson Video Relay, you are not only denying equal access, you are setting a precedent that people with various capabilities or disabilities should not and do not have the ability to experience life to the fullest. This is not supportive of the American with Disabilities Act or highlighted with the FCC website and will limit the ability of the Deaf population to have access to communicate with the hearing population. This impact will shut down the lines of communication by impacting and targeting select successful companies. As displayed on the FCC website:

??(21) Telecommunications relay services (TRS). Telephone transmission services that provide the ability for an individual who has a hearing or speech disability to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing or speech disability to communicate using voice communication services by wire or radio??

The mode of communication is important to establish equality for individuals who are deaf and it is critical for various companies, including Sorenson to be compensated justifiably and appropriately for the service their professional, well trained, and reliable interpreters provide on a daily basis to become the voice for their deaf clients. There should be an equal distribution of funding for the video relay services, divided amongst all of the agencies that provide these amazing and necessary services.

I understand the holistic nature of this decision and I would like to thank you for your time and effort in this ordeal. Please do not hesitate to contact me via email or by phone to discuss any further details related to this prior to the July 1st date.

In closing,

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